



292510
2020-14-C

June 23, 2020

Ms. Jocelyn Boyd, Chief Clerk/Administrator
SC Public Service Commission
101 Executive Center Drive, Suite 100
Columbia, SC 29210

RE: Annual Report of Eligible Telecommunications Carriers

Dear Ms. Boyd:

In accordance with Commission Regulations 103-690.1(B) and as modified by PSC Order No. 2007-657, FTC Communications, LLC, dba FTC Wireless, files the attached declarations and responses with the South Carolina Public Service Commission as required by June 30, 2020. Due to the proprietary nature of the information provided, Exhibit 2, Exhibit 3, and Exhibit 4 are marked as confidential and included under separate seal. I request the Commission to treat the sealed information confidentially as such information may be used by competitors to their advantage in targeting market areas specifically identified in our business plan. A copy of this report has been filed under separate cover with the South Carolina Office of Regulatory Staff, as required under 103-690.1B.(a).

Sincerely,

A handwritten signature in black ink that reads "Sandra Moore".

Sandra Moore
External Affairs and Regulatory Analyst

Enclosure

CC: Ms. Nanette S. Edwards, Executive Director – SC ORS

FTC Communications, LLC (dba FTC Wireless)
PSC Annual Report of Eligible Telecommunications Carriers
Amended Rules and Regulations 103-690.1
Year Ending December 31, 2019

In accordance with Docket No. 2006-37-C, Order No. 2007-657 which proposed certain modifications to SC Regulation 103-690.1(B), which more specifically detailed annual reporting requirements of common carriers designated under 47 U.S.C. 214(e)(2) as an eligible telecommunications carrier after January 1, 2007, FTC Communications submits the following declarations to the South Carolina Public Service Commission in response to the ten (10) requirements under the proposed modifications. The presentation format following is in the form of listing each requirement separately, in bold print, followed by FTC Communications' response in normal print:

- (1) a progress report on its two-year service quality improvement plan, including maps detailing its progress toward meeting its plan targets, an explanation of how much universal service support was received and how it was used to improve signal quality, coverage, or capacity, and an explanation regarding any network improvement targets that have not been fulfilled. The information shall be submitted at the wire center level. Additionally, an updated forward-looking two-year plan shall be filed annually;**

The attached 2019 USAC Disbursement Summary (Exhibit 1) represents funding FTCC received in 2019. USF receipts have been utilized to support the completion of the capital projects of FTCC as indicated in the attached (Confidential Exhibit 2), as well as to cover operational expenses required by the associated towers. Such operational expenses include landline facility infrastructure to connect these towers to the serving wireless switch and local access lines, contract maintenance expenses, monthly switching costs and RTU (right to use fees), allocated expenses, and back office support. An updated forward-looking two-year plan is also attached (Confidential Exhibit 3), as well as a network map (Confidential Exhibit 4). Project completions and new two-year projections are reported by fiscal year in order to comply with FTCC's fiscal year budgets.

- (2) detailed information on any outage, as defined in 47C.F.R.~4.5, of at least 30 minutes in duration for each service area in which an eligible telecommunications carrier is designated for any facilities it owns, operates, leases, or otherwise utilizes that potentially affect (a) at least ten percent of the end users served in a designated service area; or (b) a 911 special facility, as defined in 47 C.F.R. ~4.5(e). Specifically, the eligible telecommunications carrier's annual report must include information detailing: (a) the date and time of onset of the outage; (b) a brief description of the outage and its resolution; (c) the particular services affected by the outage; (e) steps taken to prevent a similar situation in the future; and (f) the number of customers affected;**

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FTCC is pleased to respond that it has experienced no such outages of the magnitude required for this reporting for the year ending December 31, 2019.

- (3) the number of requests for service from potential customers within the eligible telecommunications carriers' service areas that were unfulfilled during the past year. The carrier shall also detail how it attempted to provide service to those potential customers;**

As a wireless service provider, FTCC normally fulfills all service requests that have met the required credit criteria prior to the customer leaving the point of sale. Even customers that are credit challenged are given the option of security deposits or prepaid wireless services. As of December 31, 2019, FTCC reports no unfulfilled service requests to customers meeting its credit criteria.

- (4) the number of complaints or trouble reports per 1000 handsets or access lines;**

FTCC reports a total of 1,104 trouble reports were received during the year ending December 31, 2019. This equates to a monthly average of 3.68 troubles per 1000 handsets based upon a total of 25,000 handsets.

- (5) certification that it is complying with applicable service quality standards and consumer protection rules, as designated by the Commission;**

As testified in its ETC application proceeding, FTCC maintains regional offices throughout its rural South Carolina service area to facilitate the provision of service to the public, and its technical personnel are available to deal with emergency situations seven days a week, twenty-four hours a day and that it has adopted the Cellular Telecommunications and Internet Association's (CTIA) Consumer Code for Wireless Service (Hearing Tr. p. 19). As a condition of the new requirements under the proposed changes to Regulation 103-690.1, FTCC further certifies that it is complying with the Cellular Telecommunications and Internet Consumer Code for Wireless Service.

- (6) a detailed report and certification that the carrier is able to function in emergency situations;**

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In the ETC proceedings, FTCC explained how it has prepared for emergencies with battery backup or permanent generators at all of its cell sites. Additionally, FTCC has a cellular on wheels (COW), which is a portable cell site that can be temporarily deployed to locations where emergency conditions have disrupted service or where a site experiences a spike in traffic (Hearing Tr. p. 19). Each newly constructed site includes the installation of a permanent generator to retain power in emergency situations when commercial power is out. FTCC certifies it is able to function in emergency situations through use of these emergency procedures.

- (7) for non-incumbent local exchange carriers certification that the carrier is offering a local usage plan comparable to that offered by the incumbent LEC in the relevant service areas;**

Not only does FTCC have available a wireless local calling plan with comparable rates and calling areas to that offered by the incumbent LEC (FTC), but FTCC also allows its customers on all other wireless plans to dial all FTC and FTC affiliate customers within the entire service area without use of allotted wireless minutes.

- (8) certification that the carrier acknowledges that the Federal Communications Commission may require it to provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area;**

On December 28, 2015, the Federal Communications Commission released an order (FCC 15-166) which eliminated the equal access requirement for all incumbent local exchange carriers. Therefore, this certification is no longer applicable.

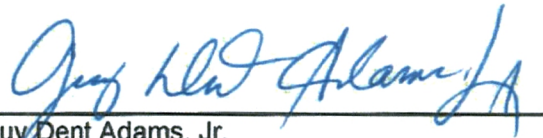
- (9) the number of Lifeline customers and the number of customers that received Link Up assistance as of Dec 31st of the prior year; and**

As of December 31, 2019, FTCC had 15 wireless customers receiving Lifeline Assistance.

- (10) copies of responses to the Lifeline Verification Survey or Certification filed with the Universal Service Administrative Company on August 31 of each year.**

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In the 2016 Lifeline Modernization Order, the FCC adopted rules to change the recertification process from once per calendar year to a rolling process based on the subscriber's service initialization date. This new rolling recertification was effective July 1, 2017. FTCC elected to have the Universal Service Administration Company perform this rolling recertification process for its Lifeline subscribers which resulted in the de-enrollment of 8 subscribers in the year ended December 31, 2019. FTCC filed the required FCC Form 555 with the Universal Service Administrative Company prior to the January 31, 2020, required filing date. See attached Exhibit 5.



Guy Dent Adams, Jr.
FTC Communications, LLC
Chief Operating Officer

FTC Communications, LLC (dba FTC Wireless)
Annual CETC Report

EXHIBIT 1 - 2019 USAC DISBURSEMENT SUMMARY

GL Period	February-19 JANUARY	March-19 FEBRUARY	April-19 MARCH	May-19 APRIL	June-19 MAY	July-19 JUNE	August-19 JULY	September-19 AUGUST	October-19 SEPTEMBER	November-19 OCTOBER	December-19 NOVEMBER	January-20 DECEMBER	TOTAL
FROZEN HIGH COST SUPPORT	131,548.00	131,548.00	131,548.00	131,548.00	131,548.00	131,548.00	131,548.00	131,548.00	131,548.00	131,548.00	131,548.00	131,548.00	1,578,576.00
HIGH CLOST LOOP FUND (HCL)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SAFETY NET ADDITIVE (SNA)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
INTERSTATE COMMON LINE SUPPORT (ICLS)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
LOCAL SWITCHING SUPPORT	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
LIFELINE	398.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,193.00	0.00	0.00	0.00	1,591.00
LINKUP	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TOTAL	131,946.00	131,548.00	131,548.00	131,548.00	131,548.00	131,548.00	131,548.00	131,548.00	132,741.00	131,548.00	131,548.00	131,548.00	1,580,167.00

Annual Lifeline Eligible Telecommunications Carrier Certification Form All carriers must complete all or portions of all sections Form must be submitted to USAC and filed with the Federal Communications Commission

IMPORTANT: PLEASE READ INSTRUCTIONS FIRST

Deadline: January 31st (Annually)

249002		143003921
Study Area Code (SAC)		Service Provider Identification Number (SPIN)
(An Eligible Telecommunications Carrier (ETC) must provide a certification form for each SAC through which it provides Lifeline service).		
2019	SC	FTC Communications LLC
Recertification Year	State	ETC Name
N/A		Farmers Telephone Cooperative, Inc.
DBA, Marketing, or Other Branding Name		Holding Company Name
(If same as ETC name, list "N/A" Do <u>not</u> leave blank)		(If same as ETC name, list "N/A" Do not leave blank)

Does the reporting company have affiliated ETCs?

Yes ☒

No ☐

Provide a list of all ETCs that are affiliated with the reporting ETC, using page 4 and additional sheets if necessary. Affiliation shall be determined in accordance with Section 3(2) of the Communications Act. That Section defines "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person." 47 U.S.C. § 153(2). See also 47 C.F.R. § 76.1200.

Affiliated ETC's SAC	Affiliated ETC's Name

ETCs Subject to the Non-Usage Requirements

All ETCs must complete the appropriate check-box. ETCs that do not assess and collect a monthly fee from their Lifeline subscribers are subject to the non-usage requirements. ETCs subject to the non-usage requirements must indicate the number of subscribers de-enrolled by month in Section 4. ETCs that only assess a fee but do not collect such fees are subject to the non-usage requirements and must also indicate the number of subscribers de-enrolled by month.

Is the ETC subject to the non-usage requirements? Yes ☒ No ☒

If yes, record the number of subscribers de-enrolled for non-usage by month in Block Q below.

P	Q
Month	Subscribers De-Enrolled for Non-Usage
January	0
February	0
March	0
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0
Total Subscribers	0

For purposes of this filing, an officer is an occupant of a position listed in the article of incorporation, articles of formation, or other similar legal document. An officer is a person who occupies a position specified in the corporate by-laws (or partnership agreement), and would typically be president, vice president for operations, vice president for finance, comptroller, treasurer, or a comparable position. If the filer is a sole proprietorship, the owner must sign the certification.

Initial Certification *All ETCs must complete this section*

I certify that the company listed above has certification procedures in place to:

- A) Review income and program-based eligibility documentation prior to enrolling a consumer in the Lifeline program, and that, to the best of my knowledge, the company was presented with documentation of each consumer's household income and/or program-based eligibility prior to his or her enrollment in Lifeline; and/or
- B) Confirm consumer eligibility by relying upon access to a state database and/or notice of eligibility from the state Lifeline administrator prior to enrolling a consumer in the Lifeline program.

I am an officer of the company named above. I am authorized to make this certification for the Study Area Code listed above.

Initial GDA

Minimum Service Level

I certify that the company listed above is in compliance with the minimum service levels set forth in the 47 CFR Section 54.408.

I am an officer of the company named above. I am authorized to make this certification for the SACs listed above.

Initial GDA

Annual Recertification

Do not leave empty blocks. If an ETC has nothing to report in a block, enter a zero.

Report the number of Lifeline subscribers due for recertification by month (January-December)

- A. Subscribers eligible for recertification by anniversary month
- B. Subscribers de-enrolled prior to recertification attempts
- C. Total number of subscribers ETC is responsible for recertifying (A-B)

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
A.	3	0	0	0	2	2	2	2	1	0	1	4	17
B.	0	0	0	0	0	0	0	0	0	0	0	0	0
C.	3	0	0	0	2	2	2	2	1	0	1	4	17

Recertification Methods

State of federal database

- D. Subscribers recertified through ETC access to state or federal database by anniversary month

Report the number of eligible subscribers verified through access to a state or federal database.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
D.	0	0	0	0	0	0	0	0	0	0	0	0	0

- E. Name of the data source(s) used to verify consumer eligibility:

ETC Direct Contact

- F. Subscribers contacted by ETC directly to recertify (You may also use this section to report subscriber initiated recertifications).

Report the number of Lifeline subscribers the ETC contacted directly to obtain recertification of eligibility

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
F.	0	0	0	0	0	0	0	0	0	0	0	0	0

- G. Subscribers who failed to recertify through ETC direct outreach attempt

Report the number of Lifeline subscribers de-enrolled due to ineligibility or non-response to the ETC's outreach attempt.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
G.	0	0	0	0	0	0	0	0	0	0	0	0	0

H. Subscribers who recertified through ETC direct outreach attempt

Report the number of Lifeline subscribers that successfully recertified through ETC's outreach attempt.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
H.	0	0	0	0	0	0	0	0	0	0	0	0	0

Third Party

I. Subscribers whose eligibility was reviewed by state administrator, third party administrator, or USAC

Report the number of Lifeline subscribers contacted by a state administrator, third party administrator, or USAC for the purpose of recertification.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
I.	3	0	0	0	2	2	2	2	1	0	1	4	17

J. Name of third party administrator used to verify subscriber eligibility:

USAC

K. Subscribers de-enrolled as a result of a third party recertification attempt

Report the number of subscribers as a result of ineligibility or non-response to outreach from a state administrator, third party administrator, or USAC.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
K.	0	0	0	0	1	0	1	3	0	0	0	3	8

L. Subscribers who recertified through a state administrator, third party administrator, or USAC's recertification effort

Report the number of subscribers that recertified through a request from a state administrator, third party administrator, or USAC

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year Total
L.	3	0	0	0	2	2	1	0	1	0	1	1	11

Certification:

Recertification Method: Database

I certify that the company listed above has procedures in place to recertify consumer eligibility by relying on a database. I am an officer of the company named above. I am authorized to make this certification for the SAC(s) listed above.

Initial _____

Recertification Method: ETC

I certify that the company listed above has procedures in place to recertify the continued eligibility of all of its Lifeline subscribers, and that, to the best of my knowledge, the company obtained signed certifications from all subscribers attesting to their continuing eligibility for Lifeline. I am an officer of the company named above. I am authorized to make this certification for the SAC(s) listed above.

Initial _____

Recertification Method: Third Party

I certify that the company listed above has procedures in place to recertify consumer eligibility by relying on an administrator. I am an officer of the company named above. I am authorized to make this certification for the SAC(s) listed above.

Initial GDA

No Subscribers

I certify that my company did not claim federal low income support for any Lifeline subscribers for the current Form 555 data year. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial _____

$M = (G+K)$	$N = (D+F+I)$	$O = M/N \times 100$
Total number of subscribers de-enrolled as a result of recertification	Total number of subscribers ETC is responsible for recertifying	Percent of subscribers due for recertification who were de-enrolled
8	17	47.05%

Signature Block

By signing below, I certify that the company listed above is in compliance with all federal Lifeline certification procedures. I am an officer of the company named above. I am authorized to make this certification for the Study Area Code (SAC) listed above.

Signed,

Guy Dent Adams Jr COO Subsidiaries

Signature of Officer

adamsd@ftc.org

Email Address of Officer

Person Completing This Certification Form

Guy Dent Adams Jr COO Subsic

Printed Name and Title of Officer

Jan 24, 2020

Date

Contact Phone Number

Affiliated ETCs

[illegible]